# Rule 21 Working Group Meeting #44 May 20, 2003 SGG&E Offices Kearney Mesa Road San Diego, CA 9:30 am – 4:00 pm

### **Attendees:**

Chair: Scott Tomashefsky

# **Participants:**

Aldridge, Pat SCE

Ball, Greg PowerLight
Blumer, Werner, CPUC (phone)
Cervantes, Jose City of San Diego

Dossey, Tom SCE

Edds, Mike Edds Consulting

Fukumoto, Paul IR
Iammarino, Mike SDG&E
Iliev, Karl SDG&E
Jackson, Jerry PG&E
Lacy, Scott SCE

Luke, Robin RealEnergy Martini, Bill Tecogen

Minnier, Randy, MPE Consulting

Panora, Bob, Tecogen
Osborne, Bill SDG&E
Osborn, Natalie SDREO
Prabhu, Edan Reflective
Rawson, Mark CEC
Skeen, Jim SMUD
Solt, Chuck Lindh and

Associates

Swanson, Leanne SCE Torribio, Gerry, SCE Whitaker, Chuck Endecon

Gardner, Susan RedHawk Energy Redding, Dave Riverside PU

Tunnicliff, Dan SCE

The meeting was called to order.

- 1. The next Working Group meeting will be on Tuesday, June 24, in Fontana, hosted by the kind courtesy of Edison.
- 2. Susan Gardner requested clarification on the bibliography she is putting together. She will use her best judgment on what to include.
- 3. Comments are due to Scott Tomashefsky by May 27, 2003 on the White Paper he distributed regarding a proposed OIR to resolve certain interconnection issues. Scott Tomashefsky will integrate the comments and issue the White Paper for a second review and comment. No formal public workshop is currently planned relative to the White Paper. Scott will then use the paper for CEC follow-up actions. It was suggested that if differing perspectives exist on a particular issue, the White Paper present more than one perspective. Reviewers were encouraged to generate comments that present their particular points of view.
- 4. A draft California Interconnection Guidebook will soon be issued to the Working Group for comment. It was suggested that the Guidebook be coordinated with the handbook being prepared by PG&E. The current version of the planned PG&E handbook is extensive and detailed, and includes links to many technical issues. The California Guidebook will focus more on the big picture. PG&E will have the opportunity to comment on the draft Guidebook.
- 5. SDG&E presented the draft application form as revised. SCE will review the revised application presented by SDG&E and a revised application created. The revised application will have about the same length, same format. The application needs to be revised in any case to reflect expanded net metering and biogas net metering legislation and regulation (DG developers are already marking up existing applications to accommodate these new regulations). AB 58 and AB 2228. The utilities stated that almost all applications received today are deficient in some way and go through one or two iterations before they are acceptable.
- 6. C101 Export Screen: Discussed the changes proposed in "C101 Potential IRP change 2003-05-01.doc". PG&E would like Option 3 removed so that all exporting systems would go through Supplemental Review (potentially with an increase in the percent of line section peak load allowed under Screen 3). Others prefer to leave Option 3 in place. It was suggested that rather than eliminate Option 3, another approach would be to provide a technical basis for changing the Option 3 criteria.

# **Non-Technical Discussion (afternoon)**

- 7. The new OIR should perhaps include a section on sunset dates for applications, for agreements, etc. Sunset dates would help with the 3000 MW and 1500 MW caps in the recent CPUC decision providing exit charge exemptions for certain DG up to certain thresholds.
- 8. Dispute resolution issues: We should have a simpler process especially for resolving issues related to smaller problems. Pat Aldridge presented the CPUC's "Informal Resolution Process". The informal resolution process is in three steps, is generally quick, and often results in amicable resolutions. There may be value in referencing the informal resolution process in Rule 21. It will also be addressed in the Guidebook.

## **Technical Issues Discussion (afternoon)**

- 9. T103 Disconnect Switch: Scott Lacy presented his background paper "Disconnect issues Lacy.doc", which referenced other documents discussing primarily the terms "visible" and "accessible". It was suggested that minor changes be made to Scott's proposed revision "Supplemental Review Guideline (SRL edits).doc" (remove reference to revenue meter, add reference to Rule 21 language where disconnect is discussed). Scott will revise the document and forward for final approval.
- 10. T113 Redundancy (New Item): Wording in Rule 21 Section D.1.d has been cited as the basis for requiring redundant relaying with otherwise certified equipment. This interpretation, which currently is not universally held, increases the uncertainty of interconnection requirements and if applied broadly, has the potential to invalidate the current certification process. The subgroup defined the Issue, Champion (Jim Skeen), Priority (High), and Next action (Jim Skeen will speak with Mohammed Vaziri and come back with a recommendation).
- 11. T110 Networks: Jim Skeen noted that he has received internal input from SMUD and wants to revise his write-up. Given the rather specialized nature of the topic, Jim is also considering holding a separate one-day meeting.
- 12. T112 Anti-Islanding Definitions: Reviewed and proposed some changes to the definition. Also suggested some changes to Rule language (remove or replace the word "positive" in Significance of Screen 2 (i.e. to assure). Chuck Whitaker will revise, include suggested changes to Rule 21, and redistribute for final review.
- 13. T121 Line Section Definition: Add a fused lateral between "G2" and "fuse" that includes both load and generation. Discussed fuse on shared secondary transformer decided to exclude from the definition (i.e. it does not describe a

Respectfully Submitted:		
Edan Prabhu		
Approved:		
Scott Tomashefsky		

comments.

line section). Chuck Whitaker will make these changes and redistribute for